



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Northeast Regional Office • 205B Lowell Street, Wilmington MA 01887 • 978-694-3200

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December 7, 2016

Massachusetts Mill III LP
31 Saint James Ave.
Boston, MA 02116-0000

RE: Lowell
169.2 Bridge Street
RTN: 3-0033474

Attention: Joseph Mullins

Release Abatement Measure
Conditional Approval; M.G.L.
c. 21E & 310 CMR 40.0000

Dear Mr. Mullins:

The Massachusetts Department of Environmental Protection (MassDEP) is in receipt of a Release Abatement Measure (RAM) Plan on December 1, 2016. The RAM Plan was submitted by you for the management of up to 2000 yd³ of remediation waste as part of a property renovation project. The RAM Plan was developed by Brian Butler, a Licensed Site Professional (LSP# 5736) with Goldman Environmental Consultants Inc., and was submitted pursuant to 310 CMR 40.0440 of the Massachusetts Contingency Plan (MCP).

Release Abatement Measures are a class of remedial actions that are voluntarily undertaken at locations where a release of oil and/or hazardous material has occurred. Such response actions are intended to reduce risks at the disposal site, and/or to increase the cost effectiveness of future response actions which may be necessary at the disposal site, pursuant to the Massachusetts Oil and Hazardous Material Release Prevention and Response Act, M.G.L. c.21E and the Massachusetts Contingency Plan, 310 CMR 40.0000.

Proposed Remedial Actions

The remedial actions proposed in the RAM Plan involve the excavation and management of soil contaminated with Polychlorinated Biphenyls (PCBs), heavy metals and insecticide under RTN 3-0033474; a number of additional response actions are to be undertaken concurrently under RTNs 3-0033101, 3-0033793 and 3-0033853. Details of those actions are not included in this letter, as MassDEP has already issued approval for those actions on November 22, 2016. A

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MassDEP Website: www.mass.gov/dep

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summary of proposed remedial actions pertaining to this RAM are provided below:

1. Modify the utility vault identified on Figure 10B of the RAM Plan to contain both a clean utility corridor for an existing sewer line and to allow for reuse of contaminated soils in the remaining void. The sides of the vault will be removed to three feet below the proposed finish grade, followed by creation of a four foot wide clean corridor surrounding the line, wrapped with a geotextile. Approximately 125 cubic yards (yd^3) of contaminated soils (currently in a 300-400 yd^3 pile on the west end of the property) will be placed in the remainder of the vault, to be covered with geotextile and six inches of gravel for use as a temporary roadway during additional remedial actions. The vault will be eventually covered with clean fill to final grade.
2. Conduct additional PCB sampling in the vicinity of boring B-18, as depicted on Figure 10C of the RAM Plan. Soils identified as having greater than 50 milligrams per kilogram (mg/kg) of PCBs will be removed from the site. Confirmatory sampling in a grid pattern will be employed to confirm the successful removal of soils with elevated PCB concentrations. Up to 50 yd^3 may be generated from this activity.
3. Once elevated PCB concentrations have been addressed, conduct additional soil removal, including stockpile SP-3, soils placed in the top of fuel bunker FO-1, the tops of tank graves GT-1 & -2, and the top foot of soils from the eastern edge of the courtyard. Soil excavation will cease when all asbestos-contaminated soils from RTN 3-0033853 (comingled with the soils containing PCBs and other contaminants under this RTN) have been removed. These soils will be added to the western stockpile referenced in item (1) above. This work will be repeated in a similar manner for the central part of the courtyard as well.
4. Following additional remedial actions on the eastern end of the courtyard, the stockpiled soils will be interred in a specially prepared repository in the location of fuel bunker FO-1. The repository will have orange snow fence placed along the sidewalls, then lined with a geotextile. The approximate dimensions are 60 feet by 40 feet with a depth of approximately 11 feet (two feet above the water table), and will be designed to hold up to 1,000 yd^3 of soil.
5. Once the western stockpile is moved, the top 3 feet of soils will be stripped from the western end of the courtyard and added to the repository. If soils cannot be added to the repository, they will be stockpiled & characterized for proper disposal. As part of the western courtyard work, the coal chute and 4 drywells previously filled with contaminated soils will be excavated to 3 feet below finish grade and the structures dismantled to that depth. Each structure will then be capped with concrete to prevent future exposure.
6. Final work will include the inclusion of any temporary roadway materials into the repository, the installation of a clean corridor for a future stormwater management system and the covering of contaminated soils with variously colored geotextiles (to mark utility corridors, soil repositories, etc.) to be followed by clean fill to grade.

The remedial actions proposed within the RAM Plan may proceed contingent upon your adherence to the following conditions, including any subsequent conditions of approval, and all applicable MassDEP regulations governing response actions. Your initiation of the activities will constitute your understanding and acceptance of these conditions.

I. Site Specific Conditions

- 1) No soil excavation containing detectable levels of PCBs may occur on site until approval to conduct the proposed actions is received from the US EPA and a copy submitted to MassDEP. If the US EPA requires assessment and/or remedial response actions that differ significantly from those proposed in this submittal, then a Modified RAM Plan must be submitted.
- 2) Real-time dust monitoring must be conducted around each discrete activity at the Site that involves the excavation, stockpiling, placement, transportation or other related handling of contaminated soil. The completion of air sampling and dust monitoring is not weather-dependent, and must continue throughout the duration of soil management activities.
- 3) Dust mitigation measures, or work cessation, must be implemented if real-time dust monitoring results exceed the risk-based action level of 150 ug/m³.

II. General Conditions

- 1) This response action must be performed in a manner and to a degree which ensures the protection of human health, safety, public welfare and the environment;
- 2) This response action must be conducted under the direct supervision of a competent professional with specific experience in site remediation/environmental engineering practices, using good engineering procedures and accepted construction practices, and must be managed, supervised, actually performed or periodically reviewed by a Licensed Site Professional;
- 3) The Release Abatement Measure Plan must be conducted in compliance with all applicable public involvement provisions specified in 310 CMR 40.0447; and
- 4) Except as provided in 310 CMR 40.0446(7), this RAM will not be considered complete until all stockpiled/stored Remediation Waste generated as a result of these activities has been removed from the site or reused on-site pursuant to the provisions of 310 CMR 40.0030.

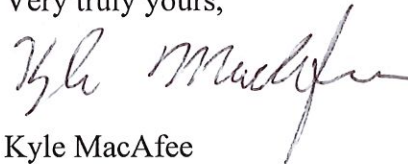
III. Required Submittals

- 1) Pursuant to the provisions of 310 CMR 40.0445, a Release Abatement Measure Status Report must be submitted to MassDEP within 120 days of the date of the submittal of the initial RAM Plan. Subsequent RAM Status Reports must be submitted to MassDEP every 6 months thereafter for the duration of the RAM.
- 2) For disposal sites where Active Operation and Maintenance of a remedial action is being conducted, a Remedial Monitoring Report shall be submitted on a schedule described in 310 CMR 40.0445(5).

- 3) Within 60 days of the date of completion, a Release Abatement Measure Completion Report as specified in 310 CMR 40.0446 must be submitted to MassDEP.

Your cooperation in this matter is appreciated. If you have any further questions regarding this matter, please contact Kyle MacAfee at (978) 694-3348 or at the letterhead address. All future correspondence regarding this location must reference the MassDEP Release Tracking Number listed in the subject heading.

Very truly yours,



Kyle MacAfee
Environmental Engineer
Risk Reduction



Iris Davis
Section Chief
Risk Reduction and Enforcement

cc: Mayor Edward Kennedy, City of Lowell, cgettings@lowellma.gov
Lowell Health Department, Kerrran Vigroux, Director, kvigroux@lowellma.gov
Kimberly Tisa, PCB Coordinator, US EPA, Tisa.Kimberly@epa.gov
Brian Butler, LSP-of-Record, bbutler@goldmanenvironmental.com
Data Entry/File (RAM/APWRIT)